

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

ROY M. GREENWAY, JR.
RACHEL N. GREENWAY
DEBTORS

CASE NO. 1:18-BK-02636
CHAPTER 13

AMERICAN HONDA
MOVANT

V.

ROY M. GREENWAY, JR.
RACHEL N. GREENWAY
RESPONDENTS

Answer to Motion for Relief

and
CHARLES J. DEHART, III

TRUSTEE

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, this 13th day of July, 2020, comes the above Debtor, by their counsel, CGA Law Firm, PC, and respectfully requests that the Court deny Movant's Motion for Relief and in support thereof avers as follows:

1. Admitted.
2. Admitted.
3. Denied. Paragraph 3 refers to a writing for which the terms speak for itself. Any characterization is denied.

4. Denied. Paragraph 4 refers to a writing for which the terms speak for itself. Any characterization is denied. The Debtor has made some post-petition payments to date. Debtor intends to cure the default.

5. Denied. The movant is not entitled to a waiver of Bankruptcy Rule 4001(a)(3).

WHEREFORE, the Debtors respectfully request that the Court deny Movant's Motion.

Respectfully submitted,

CGA Law Firm, PC

By: /s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. ID No. 323803
135 North George Street
York, PA 17401-1282
Telephone: 717-848-4900
Counsel for Debtors

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IN RE:

ROY M. GREENWAY JR.
RACHEL N. GREENWAY,
DEBTOR

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AMERICAN HONDA FINANCE
CORPORATION
MOVANT

V.

ROY M. GREENWAY JR.
RACHEL B. GREENWAY

RESPONDENT
and
CHARLES J. DEHART, III
TRUSTEE

Certificate of Service

I certify that I am more than 18 years of age and a true and correct copy of the attached Answer to Motion for Relief from Automatic Stay was served upon the following parties in the following manner:

| Name | Mode of Service |
|----------------------------|-----------------|
| Office of the U.S. Trustee | Via CM/ECF |
| William E. Craig, Esquire | Via CM/ECF |

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 13, 2020

By: /s/ E. Haley Rohrbaugh